

CONTINUATION OF APPLICATION FOR SEARCH WARRANT

I, Joshua White, being first duly sworn hereby state as follows:

INTRODUCTION

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and I have served as such since July 2022. Prior to serving as an ATF Special Agent, I was employed by the United States Secret Service as a Uniformed Division Officer for three and a half years. My daily responsibilities while serving were to screen passholders and appointments who had access to the White House Grounds, assist with protectee movements onto and off of the White House Complex, and enforce D.C. Code as well as Federal Law. I have completed the Federal Law Enforcement Training Center (FLETC) Uniformed Police Training program (UPTP) and the Criminal Investigator Training Program (CITP) with a total combination of over 800 hours of classroom and practical training. I have completed ATF's Special Agent Basic Training (SABT) academy with over 500 hours of classroom and practical training. I am presently assigned to ATF's Lansing Office conducting narcotics/firearms investigations.

2. The information set forth in this continuation for a search warrant is based upon my personal knowledge, training, and experience, as well as information provided to me by other witnesses. As this continuation is submitted solely to establish probable cause for the requested warrant, I have not set forth all of the information known to me or to other law enforcement officers concerning this matter.

3. Based on the information set forth below, I respectfully submit that there is probable cause to believe that evidence of violations of federal law by

Frederick Lamar EDMOND Jr., specifically 18 U.S.C. § 922(g)(1), possession of firearm by a convicted felon and 18 U.S.C. § 922(o), possession of a machinegun, will be found on the electronic device (hereinafter the “**Subject Device**”), specifically:

- a. One (1) blue Apple iPhone that was seized from a vehicle EDMOND was driving on August 9, 2024 during his arrest, currently held at the Lansing Police Department Operations Center in Lansing, Michigan in the Western District of Michigan (LPD Evidence Item #007).

The **Subject Device** is specifically described in Attachment A.

4. This Application requests the issuance of a warrant authorizing the forensic examination of the **Subject Device** for the purpose of identifying electronically stored data particularly described in Attachment B. The categories of electronically stored information and evidence sought are described in Attachment B.

PROBABLE CAUSE

5. Over the past three months, Lansing Police Department (LPD) and ATF Lansing have been investigating EDMOND for being illegally possessing firearms. EDMOND has made numerous social media posts, both on Instagram and Facebook, posing with what appear to be firearms. EDMOND is a convicted felon and therefore prohibited from possessing firearms. LPD collected three posts on EDMOND’s Facebook account from on or about July 15, 2024; July 31, 2024; and August 4, 2024, showing EDMOND with what appears to be a firearm. ATF collected five posts on EDMOND’s Instagram account from on or about December 5, 2023; March 12, 2024; June 23, 2024; July 8, 2024; and July 15, 2024 showing EDMOND with what appears to be a firearm or firearms.

6. On August 9, 2024, the Lansing Police Department obtained a search warrant for (i) 4921 Delray Drive, Lansing, Michigan 48910, (ii) EDMOND’s person

if he was present at the residence or left on foot, and (iii) any vehicle in which EDMOND was located. LPD and ATF surveilled EDMOND leaving the Delray Drive residence driving a white Chevrolet Blazer. EDMOND stopped at a red light and LPD and Michigan State Police (MSP) approached and stopped EDMOND for a search pursuant to the warrant and outstanding warrants for EDMOND's arrest.

7. As EDMOND was being detained, in plain view, officers observed an extended magazine and the back of a pistol grip protruding from under the driver's seat. Officers and agents located and seized the firearm, a loaded Glock Model 23, .40 caliber semi-automatic pistol, loaded with twenty-one rounds of .40 caliber ammunition underneath the driver's seat where EDMOND was seated. Pictured below is the recovered firearm, with the magazine and ammunition removed, taken from the traffic stop of EDMOND on August 9, 2024. EDMOND was arrested and lodged at the Lansing City Jail.



8. During the stop, before EDMOND exited the vehicle, officers saw him reach into the center console area of the vehicle to grab the **Subject Device**. The **Subject Device** was then taken out of EDMOND's hand.

9. LPD, MSP, and ATF then executed the search warrant at 4921 Delray Drive. During the search, law enforcement located a Glock Model 29 10mm pistol, with an attached machinegun conversion device, commonly referred to as a "Glock Switch," loaded with thirty rounds of 10mm ammunition. The installation of a machinegun conversion device allows a semiautomatic firearm to fire as an automatic weapon. The firearm is pictured below. This firearm was located next to the bed, in a bedroom where officers also found an expired Michigan ID issued to EDMOND, clothing law enforcement had seen EDMOND wearing on social media, and paperwork in EDMOND's name.



10. I spoke with ATF SA Hurt, who is an expert in interstate nexus for ATF. He advised that both Glock Pistols recovered on August 9, 2024 were manufactured outside the State of Michigan.

11. EDMOND was charged by federal complaint on August 10, 2024 with one

count of felon in possession of a firearm in violation of 18 U.S.C. § 922(g)(1).

12. The firearm recovered during the search of the 4921 Delray Drive residence was test fired for NIBIN (National integrated Ballistics Information Network) and a preliminary lead came back to a shooting that occurred in the city of Lansing on June 25, 2024. This is an ongoing investigation by LPD.

13. LPD is also investigating EDMOND as a suspect in a non-fatal shooting that occurred July 31, 2024 in Lansing where the victim, a passenger in a vehicle, was shot in the face but survived. A witness told LPD that the driver of the vehicle was the likely target of the shooting and that driver had been feuding with EDMOND. Surveillance video in the area captured video of a vehicle in the vicinity of the shooting just prior to the shooting; and the depiction of the vehicle generally matches Chevrolet Blazer, the vehicle EDMOND was arrested in on this offense.

14. EDMOND was prohibited from possessing a firearm because he had been convicted of the following felony offenses, both in November of 2021: (i) lying to a peace officer during a violent crime investigation and (ii) felony identity theft.

OFFICER TRAINING AND EXPERIENCE

15. Based on my training and experience, I understand the following:

- a. I know through numerous firearm investigations that individuals who illegally possess firearms often utilize cell phones like the **Subject Device** to acquire, distribute, and document possession of firearms using means of text messaging, photographs/videos, calls, emails, social media, and cellphone features.

- b. iPhones have capabilities that allow them to serve as a wireless telephone, digital camera, portable media player, GPS navigation device, and PDA. Examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device, as well as other evidence of illegal firearms violations, including but not limited to possessing firearms by a convicted felon, possessing or purchasing ammunition by a convicted felon, and purchasing or possessing devices that illegally convert firearms to machine guns;
- c. Cell phone users normally keep their cell phones on or near their person, within vehicles they are associated with, and within their residences;
- d. Global Position System (“GPS”) data on phones may show the location of an individual illegally possessing and / or purchasing a firearm, a machine gun, ammunition, a device that converts a firearm into a machine gun, a privately made firearm, as well as other individuals illegally distributing and manufacturing these items, which may provide corroborating evidence of any or all of these crimes;
- e. Individuals who use cell phones to access a cellular network knowingly or unknowingly leave a GPS footprint by utilizing cellular data. These individuals often use cell phones and social media platforms to post or tag themselves at various locations, as well as post or tag other individuals with them; iPhones have the ability to access social media platforms via the internet and/or “applications” (commonly referred to as “apps”);

TECHNICAL TERMS

16. Based on my training and experience, I use the following technical terms to convey the following meanings, and based on my training and experience and involvement in this investigation, I know the Subject Device has the capability of functioning as a wireless telephone, digital camera, portable media player, GPS and PDA:
- a. Wireless telephone: A wireless telephone (also called a mobile telephone, cellular telephone, or cell phone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone including successful and unsuccessful video call connections. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include GPS technology for determining the location of the device.
 - b. Digital camera: A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a

variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

- c. Portable media player: A portable media player (or “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video, or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.
- d. GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a

mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna's latitude, longitude, and sometimes altitude with a high level of precision.

- e. PDA: A personal digital assistant, or PDA, is a handheld electronic device used for storing data (such as names, addresses, appointments, or notes) and utilizing computer programs. Some PDAs also function as wireless communication devices and are used to access the Internet and send and receive e-mail. PDAs usually include a memory card or other removable storage media for storing data and a keyboard and/or touch screen for entering data. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can store any digital data. Most PDAs run computer software, giving them many of the same capabilities as personal computers. For example, PDA users can work with word-processing documents, spreadsheets, and presentations. PDAs may also include global positioning system technology for determining the location of the device.
- f. IP Address: An internet protocol address (or simply "IP address") is a unique numeric address used by computers on the internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the internet must be assigned an IP address so that internet traffic sent from and directed to that computer may be directed properly

from its source to its destination. Most internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

17. The warrant applied for would authorize the extraction and copying of electronically stored information, under Rule 41(e)(2)(B).

18. Based on my knowledge, training, and experience I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

19. *Forensic evidence.* This application seeks permission to locate forensic electronic evidence that establishes how the **Subject Device** was used, the purpose of the use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the **Subject Device** because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file); and
- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.

20. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the **Subject Device** consistent with the warrant. The examination may require

authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

CONCLUSION

21. I submit that based on the information set forth in this affidavit there is probable cause to believe evidence of being a felon in possession of a firearm and possession of a machinegun, including evidence supporting knowledge of such firearm and the machinegun conversion device, will be found in electronic format on the **Subject Device**.

22. Accordingly, I request that the Court issue the proposed search warrant for the **Subject Device** described in Attachment A for the items listed in Attachment B.